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December 2, 2013

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VIA ECF

The Honorable Viktor V. Pohorelsky
United States District Court
For the Eastern District of New York (Brooklyn)
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Caroline Mayorga v. First Resolution Investment Corporation, et al.
U.S.D.C. – ED of NY; C.A. No. 1:12-cv-00587-DLI-VVP
Our File No.: 59528-002**

Dear Judge Pohorelsky:

Please be advised the undersigned represents Defendant, First Resolution Investment Corporation, in connection with the above-captioned matter. Pursuant to Your Honor's Rules of Practice, please allow this correspondence serve as a formal request for adjournment of the Status Conference currently scheduled before Your Honor to take Place on Wednesday, December 4, 2013 at 2:00 p.m. in Courtroom 13A of the United States District Courthouse for the Eastern District of New York (Brooklyn).

Please be advised that the undersigned is currently rehabilitating from a recent injury and presently is unable to ambulate without the assistance of crutches or a cane. As such, the undersigned respectfully requests whether there could be a short continuance of the current Status Conference scheduled for Wednesday, December 4, 2013 at 2:00 p.m. before Your Honor in the instant matter. There have been no previous requests for adjournment or extension of this status conference. The undersigned has contacted counsel for all other parties none of which has any objection to the adjournment and rescheduling of the referenced Status Conference. To the best of the undersigned's knowledge, information and belief, the requested adjournment does not affect any other scheduled dates.

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Counsel for Plaintiff, Ahmad Keshavarz, Esquire, has indicated that he would not be available to attend a rescheduled Status Conference in the instant matter on the following dates and times:

1. Anytime before 12:00 p.m. on December 5, 2013;
2. Anytime after 1:00 p.m. on December 10, 2013;
3. Anytime before 12:00 p.m. on December 12, 2013; and
4. Any date between December 16, 2013 and January 1, 2014.

Counsel for Plaintiff, Nasoan Sheftel-Gomes, Esquire, has indicated that she would not be able to attend a rescheduled Status Conference in the instant matter on the following dates:

1. December 5, 11, 12, 17, 18 and 19, 2013;
2. December 23, 2013 – January 3, 2014; and
3. January 22-24, 2014.

The undersigned is not available to attend the rescheduled Status Conference in the instant matter on December 20, 2013.

Thank You in advance for Your consideration of the instant Motion for Adjournment.

Respectfully submitted,

SPECTOR, GADON & ROSEN, P.C.

By: 

Jonathan J. Greystone

JJG/jg
Enclosure

Cc: Ahmad Keshavarz, Esquire (via ECF)
Brian L. Bromberg, Esquire (via ECF)
Michael Noah Litrownik, Esquire (via ECF)
Harvey David Epstein, Esquire (via ECF)
Nasoan Channa Sheftel-Gomes, Esquire (via ECF)
Amanda J. Moreno, Esquire (via ECF)
Kevin E. Bowens, Esquire (via ECF)
Manuel H. Newburger, Esquire (via ECF)
Michael G. McAuliffe, Esquire (via ECF)